

**SAPONE & PETRILLO, LLP**

William S. Petrillo, Esq., Partner  
Edward V. Sapone, Esq., Partner

MANHATTAN  
40 Fulton Street, 23<sup>rd</sup> Floor  
New York, New York 10038  
Telephone: (212) 349-9000  
Facsimile: (347) 408-0492  
E-mail: ed@saponepetrillo.com

Chase S. Ruddy, Esq., Senior Associate  
Michael Vitaliano, Esq., Associate

LONG ISLAND  
1103 Stewart Avenue, Suite 200  
Garden City, New York 11530  
Telephone: (516) 678-2800  
Facsimile: (516) 977-1977  
E-mail: william@saponepetrillo.com

October 16, 2020

Hon. Richard M. Berman  
United States District Judge  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, NY 10007

Re: *United States v. Calvin Dubose*  
Docket No.: 19-CR-841 (RMB)

Dear Judge Berman:

I am counsel to Defendant Calvin Dubose. Mr. Dubose's pretrial motions are due today, October 16, 2020. I write to request a brief extension of time within which to file Mr. Dubose's motions to Monday, October 19, 2020.

The reason for this request is that, while I have drafted the motions, I have not had an opportunity to discuss the final content of the motions with Mr. Dubose. Because Mr. Dubose remains incarcerated at the MCC New York, communicating with him remains constrained due to ongoing conditions at the facility in response to the COVID-19 pandemic. The earliest that I can facilitate a conversation with Mr. Dubose to get his final input on the motions is Monday. Therefore, I am requesting this brief extension.

I have spoken to the government, by AUSA Dominic Gentile, Esq., who consents to this request.

Your Honor's consideration is greatly appreciated.

Application granted.
SO ORDERED: Date: 10/19/2020 <i>Richard M. Berman</i> Richard M. Berman, U.S.D.J.

Respectfully submitted,

/s/ Edward V. Sapone  
Edward V. Sapone